

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

MEETRIX IP, LLC,

Plaintiff,

vs.

ZOHO CORPORATION,

Defendant.

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CASE NO. 6:21-cv-01288-ADA

PLAINTIFF'S DISCLOSURE OF PRELIMINARY INFRINGEMENT CONTENTIONS

Pursuant to the Court's Order Governing Proceedings – Patent Case, Plaintiff Meetrix IP, LLC ("Plaintiff" or "Meetrix"), by and through its undersigned attorneys, states as follows:

(A) ***Preliminary Infringement Contentions;***

See Attachments A-D which reflect the preliminary infringement contentions of Meetrix in chart form based on information reasonably available to it as of this date. The asserted claims of the patent are individually enumerated in the attached claim charts. Meetrix reserves the right to seek to amend, supplement, expand, or narrow these contentions as discovery and the procedural posture of this case advances.

(B) ***Conception and Reduction to Practice Documents; and***

Plaintiff's conception documents have been produced at MEETRIX 001378-001474. Plaintiff reserves the right to supplement its production.

(C) File History for the Patent in Suit.

The file history for each of the asserted patents has been produced as reflected by the below table.

8,339,997 file history	MEETRIX 000053-000241
9,094,525 file history	MEETRIX 000242-000812
9,253,332 file history	MEETRIX 000813-001241
9,843,612 file history	MEETRIX 001242-001377

(D) Priority Date for Each Patent in Suit.

All claims of U.S. Patent No. 8,339,997 are entitled to a priority date of at least as early as March 10, 2003.*

All claims of U.S. Patent No. 9,094,525 are entitled to a priority date of at least as early as March 10, 2003.*

All claims of U.S. Patent No. 9,253,332 are entitled to a priority date of at least as early as March 10, 2003.*

All claims of U.S. Patent No. 9,843,612 are entitled to a priority date of at least as early as March 10, 2003.*

* Plaintiff reserves the right to amend the priority date as discovery develops.

Dated: March 22, 2022

Respectfully submitted,

/s/ Andrew G. DiNovo

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document *via* email.

/s/ Andrew G. DiNovo
Andrew G. DiNovo